

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

IN RE GOOGLE INC. COOKIE)	Case No. 12-MD-2358 (SLR)
PLACEMENT CONSUMER PRIVACY)	
LITIGATION)	
)	
)	
)	
This Document Relates to:)	
ALL ACTIONS)	
)	

**MOTION OF CLASS COUNSEL PURSUANT TO RULE 54(d)(2) AND RULE 23(h) FOR
APPROVAL OF ATTORNEYS' FEES AND EXPENSES AND FOR APPROVAL
OF INCENTIVE AWARDS FOR CLASS REPRESENTATIVES**

Settlement Class Counsel respectfully move the Court for an award of attorneys' fees and reasonable expenses pursuant to Rules 54(d)(2) and 23(h), incurred on behalf of the Class and for an Order permitting the payment of incentive awards to classrepresentatives.

Class Counsel seek attorneys' fees and expenses in the total amount of One Hundred and Ten Thousand Dollars (\$115,000.00), which amount was negotiated between the settling parties as a reasonable payment of attorney fees and expenses incurred in the prosecution of this case against Point Roll and, if approved by the Court, will be paid by defendant Point Roll. As set out in the Motion for Preliminary Approval (Docket 118), and included in the notice materials made available to Class members, the fee requested is in this liquidated amount and will be paid by Point Roll. As explained more fully in the accompanying Memorandum, the requested fee is well within the reasonable range when measured against the actual time and expense incurred by class counsel.

Finally, Counsel asks the Court to award \$500 for each of the four Class Representative as an incentive award for their efforts on behalf of the class.

WHEREFORE, the reasons stated and as supported by the accompanying Memorandum, Class Counsel request that the Court enter its Order(s) as follows: awarding attorney's fees and expenses in the amount of \$115,000.00 and permitting the payment of \$500 for each of the four Class Representatives, and for such other and further orders as the Court deems appropriate in the premises.

Respectfully submitted,

**BARTIMUS, FRICKLETON,
ROBERTSON & GORNY, P.C.**

/s/ James P. Frickleton

James P. Frickleton
Edward D. Robertson, Jr.
Mary D. Winter
11150 Overbrook Road, Suite 200
Leawood, KS 66211
Tel: 913-266-2300
jimf@bflawfirm.com

Executive Committee Member

STEPHEN G. GRYGIEL

/s/ Stephen G. Grygiel

Stephen G. Grygiel (DE Bar ID #4944)
88 East Bergen Place
Red Bank, NJ 07701
Tel: 732-539-3836
sgrygiel@yahoo.com

Executive Committee Member

/s/ Brian Russell Strange

Brian Russell Strange
David Holop
12100 Wilshire Boulevard, Suite 1900
Los Angeles, CA 90025
Tel: 310-207-5055
lacounsel@earthlink.net

Executive Committee Member

FINGER & SLANINA

/s/ David L. Finger

Charles Slanina (DE Bar ID #2011)
David L. Finger (DE Bar ID #2556)
One Commerce Center
1201 N. Orange Street, 7th Floor
Wilmington, DE 19801
Tel: 302-573-2525
dfinger@delawgroup.com

Liaison Counsel

LOCAL RULE 7.1.1 STATEMENT

No party to this proposed settlement opposes the relief sought in this motion. The non-settling Defendants have not been consulted due to the fact that they have been dismissed by the court.

Dated: December 2, 2013

/s/ James P. Frickleton
James P. Frickleton